

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Karolyn Kruger, M.D., *et al.*

Plaintiffs,

v.

Novant Health, Inc., *et al.*

Defendants.

Case No. 1:14-cv-208

Judge William Osteen, Jr.

Magistrate Judge Joi Elizabeth Peake

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF
EXPENSES, AND CASE CONTRIBUTION AWARDS FOR NAMED
PLAINTIFFS**

Pursuant to Rules 23(h) and 54(d)(2), Plaintiffs move that the Court approve a fee award of \$10,666,666 and a cost award of \$68,887.43 to Class Counsel, Schlichter, Bogard & Denton, LLP, as well as case contribution awards of \$25,000 to the seven Named Plaintiffs and Class Representatives: Karolyn Kruger, M.D., Candace Culton, Frances Baillie, Eileen Schneider, Judy Lewis, Linda Christensen, and Teresa Powell. As shown in Plaintiffs' supporting memorandum, in pursuing this case, Class Counsel bore tremendous risk in order to benefit the Class. In spite of this risk, Class Counsel, leveraging its hard-earned reputation as the foremost attorneys in 401(k) excessive fee litigation, achieved an exceptional result for the class by efficiently obtaining a substantial monetary fund and unprecedented affirmative relief that will continue to benefit the Class for years to come. The requested percentage of the settlement fund is comparable to attorney's fees awards in similar cases. Accordingly, based on all of the

relevant factors, and for the reasons stated in Plaintiffs' memorandum, the Court should grant this motion in all respects.

July 25, 2016

Respectfully submitted,

/s/ Jerome J. Schlichter
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CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of this filing to all counsel of record.

/s/ Jerome J. Schlichter